

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
ANDREW CHARLES HOY	:	
Debtor	:	CASE NO. 1:22-bk-00028
	:	
LAKEVIEW LOAN SERVICING, LLC,	:	
Movant	:	
	:	
v.	:	
	:	
ANDREW CHARLES HOY,	:	
Respondent	:	

ANSWER TO MOTION FOR RELIEF FROM STAY

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted that the filing of a bankruptcy petition acts as a stay upon certain foreclosure actions.
6. Proof of default is demanded at trial and this averment is therefore denied, pending Debtor's review of payments made.
7. Proof of amounts owed is demanded at trial and this paragraph is therefore denied.
8. Denied that Movant has demonstrated cause for relief from stay.
9. Admitted that Debtor may be in arrears on plan payments because the employer did not implement the wage attachment.
10. Movant has failed to satisfy all of the elements of Bankruptcy Code § 506(b) and allegations that the Debtor is responsible for payment of attorney fees and costs are therefore denied.

11. Movant has failed to satisfy all of the elements of Bankruptcy Code § 506(b) and allegations that the Debtor is responsible for payment of attorney fees and costs are therefore denied.

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Dorothy L. Mott

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